

ROWLAND & MOORE LLP

ATTORNEYS AT LAW
SUITE 400
200 WEST SUPERIOR STREET
CHICAGO, ILLINOIS 60654-3556

E-MAIL: r@m@telecomreg.com

VOICE: (312) 803-1000
FACSIMILE: (312) 803-0953

April 23, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington DC 20554

Re: Ex Parte Letter – WC Docket 09-197 – Compliance Plan of PlatinumTel Communications, LLC

Dear Ms. Dortch:

On November 8, 2011 PlatinumTel Communications, LLC (“PlatinumTel” or “Company”) submitted its Compliance Plan (“PlatinumTel Compliance Plan”) to the Federal Communications Commission (“FCC”). In Illinois, PlatinumTel currently provides Lifeline services under the service name Care Wireless. In the PlatinumTel Compliance Plan, PlatinumTel outlined the measures it will take to implement the conditions imposed by the FCC in its Forbearance Order, released on September 23, 2011.¹ On February 6, 2012 the FCC released an Order containing updated policies and rules concerning, in part, the provision of Lifeline eligible telecommunications carrier (“ETC”) services.² By this letter, PlatinumTel agrees to comply with the terms and conditions contained in the *Lifeline and Link Up Reform*

¹ *In the Matter of PlatinumTel LLC Petition for Forbearance*, Order, FCC 11-139, (released September 23, 2011). PlatinumTel affirms that it will comply with all Forbearance conditions that are consistent with the *Lifeline and Link Up Reform and Modernization Order*. See *Lifeline and Link Up Reform and Modernization Order* at ¶383.

² *In the Matter of Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training*, Report and Order and Further Notice of Proposed Rulemaking (February 6, 2012) (“*Lifeline and Link Up Reform and Modernization Order*”)

and Modernization Order related to its provision of Lifeline ETC services. Furthermore, PlatinumTel provides additional information and/or clarifications to the PlatinumTel Compliance Plan currently on file and pending with the FCC with respect to the terms and conditions of the *Lifeline and Link Up Reform and Modernization Order*. Finally, PlatinumTel respectfully requests an expedited approval, since it intends to apply for the Broadband Pilot Program upon its initiation by the Commission.³

I. PLATINUMTEL WILL PROVIDE LIFELINE ETC SERVICES PURSUANT TO THE CONDITIONS CONTAINED IN THE PLATINUMTEL FORBEARANCE ORDER AND THE COMMISSION'S LIFELINE AND LINK UP REFORM AND MODERNIZATION ORDER.

A. PlatinumTel Commits to Provide Access to 911 and E911 Services.

Paragraphs 373-75 of the *Lifeline and Link Up Reform and Modernization Order* provided further guidance regarding access to 911 and E911 services. PlatinumTel reaffirms that it will provide all of its Lifeline subscribers with 911 and E911 access from PlatinumTel handsets regardless of the status of the subscriber account or the airtime balance associated with the handset.⁴ PlatinumTel further agrees to abide by any state-specific obligations to obtain either a certification from each PSAP where it plans to offer service, or a self-certification, confirming that it provides its subscribers with 911 and E911 access.⁵

³ *Lifeline and Link Up Reform and Modernization Order* at ¶323.

⁴ PlatinumTel Compliance Plan at 4-5; *Lifeline and Link Up Reform and Modernization Order* at ¶373.

⁵ *Lifeline and Link Up Reform and Modernization Order* at ¶¶375, 383. PlatinumTel amends its Compliance Plan to make clear that it will obtain such certifications based on individual state-specific obligations. See PlatinumTel Compliance Plan at pages 4-5.

B. PlatinumTel will Comply with the Obligations Related to the Commission's Forbearance of the Own Facilities Requirement.

Paragraph 379 of the *Lifeline and Link Up Reform and Modernization Order* contains obligations related to the FCC's blanket forbearance of the "own facilities" requirement for Lifeline-only ETCs and the implementation of the terms and conditions of the Order.⁶

1. Enrollment Procedures

The *Lifeline and Link Up Reform and Modernization Order* confirmed that the Commission will transition to a governmental database in order to confirm the initial and continued eligibility of a lifeline customer. The Order stated:

As explained above, we conclude that establishing a fully automated means for verifying consumers' initial and ongoing Lifeline eligibility from governmental data sources would both improve the accuracy of eligibility determinations and ensure that only eligible consumers receive Lifeline benefits, and reduce burdens on consumers as well as ETCs. . . . We therefore direct the Bureau and USAC to take all necessary actions so that, as soon as possible and no later than the end of 2013, there will be an automated means to determine Lifeline eligibility for, at a minimum, the three most common programs through which consumers qualify for Lifeline.⁷

However, until the database is operational, PlatinumTel will continue to abide by its established enrollment procedures. In its Compliance Plan at pages 6-9, PlatinumTel described the enrollment process it has implemented in order to confirm a customer's eligibility for Lifeline assistance. PlatinumTel will accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006, and any

⁶ PlatinumTel is a facilities-based wireless carrier in Illinois, where it maintains its own switches and routers for handling voice telephony services. However, given that the *Lifeline and Link Up Reform and Modernization Order* alters the obligation for facilities on a prospective basis, PlatinumTel requests that the FCC's forbearance authority (if it did not do so already) include PlatinumTel's operation in Illinois, in addition to operations in all other states in which it does business.

⁷ Id. at ¶403.

applicable state laws.⁸ Pursuant to the *Lifeline and Link Up Reform and Modernization Order*, PlatinumTel will not retain copies of proof documentation, but rather will maintain accurate records detailing how the consumer demonstrated his or her eligibility.⁹

Pursuant to the *Lifeline and Link Up Reform and Modernization Order* PlatinumTel's certification form will also "explain in plain, easily comprehensible language that: (1) Lifeline is a federal benefit; (2) Lifeline service is available for only one line per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; and (4) a household is not permitted to receive Lifeline benefits from multiple providers".¹⁰ Upon enrollment, PlatinumTel will inform consumers about the annual re-certification requirement on the certification form.¹¹ Applicants will also be required to initial a number of disclosure statements intended to ensure that the applicant understands applicable eligibility requirements—including a statement to the effect that to the best of his or her knowledge, the applicant is not receiving Lifeline-supported service from any other Lifeline provider. Penalties for perjury will be clearly-stated on the certification form. The certification form will also contain language stating that violation of the one-per-household requirement constitutes a violation of the Commission's rules and will result in the consumer's de-enrollment from the program, and could result in criminal prosecution by the United States government.¹²

In accordance with the *Lifeline and Link Up Reform and Modernization Order*, PlatinumTel will obtain the consumer's residential address, which the consumer must indicate

⁸ Id. at ¶168.

⁹ Id. at ¶101.

¹⁰ See Id. at ¶121.

¹¹ See Id. at ¶145.

¹² Id. at ¶121.

his or her permanent address, and a billing address for the service (if the consumer's billing address differs from his or her residential address).¹³ A consumer who lacks a permanent residential address must provide a temporary residential service address or other address identifying information that could be used to perform a check for duplicative support. For applicants that use a temporary address, PlatinumTel will attempt to verify every 90 days that the subscriber continues to rely on that address. If the applicant does not respond to address verification attempts within 30 days, the subscriber may be de-enrolled from Lifeline service.¹⁴ The application form will also clearly state that Lifeline participants must provide their new address to the Company within 30 days of moving.¹⁵ PlatinumTel further agrees to comply with all other updated Commission enrollment rules.¹⁶

2. Procedures for Submitting for Reimbursement from USAC

PlatinumTel agrees to comply with all certification requirements contained in the *Lifeline and Link Up Reform and Modernization Order* and outlined in 47 CFR 54.407 when submitting for reimbursements from USAC.¹⁷

3. Ongoing Verification

The *Lifeline and Link Up Reform and Modernization Order* described the initial and annual verification procedures at paragraphs 120-148 and in Appendix C. PlatinumTel will require every consumer enrolled in the Lifeline program to verify on an annual basis that he or she receives Lifeline-supported service only from PlatinumTel and, to the best of his or her

¹³ Id. at ¶85.

¹⁴ Id. at Appendix C.

¹⁵ Id. at ¶¶85, 117.

¹⁶ See *Lifeline and Link Up Reform and Modernization Order* at ¶60 and Appendix C.

¹⁷ See, for example, Id. at ¶¶125-28.

knowledge, no one else in the subscriber's household is receiving a Lifeline-supported service.¹⁸

Any customer that is found to not comply with the rules or that fails to respond to the annual recertification process will be de-enrolled.¹⁹

At pages 9-10 of the PlatinumTel Compliance Plan, PlatinumTel described its annual verification procedures that require every consumer enrolled in the PlatinumTel Lifeline program to verify on an annual basis that they are the head of their household and only receive Lifeline service from PlatinumTel. As further described in the PlatinumTel Compliance Plan, such verifications will be required in order for the consumer to continue to receive free Lifeline service or to purchase prepaid airtime from PlatinumTel at the discounted rate only available to those customers who are enrolled in its Lifeline program. A copy of PlatinumTel's Annual Verification Form is attached hereto as Exhibit A.²⁰

Pursuant to the new rules, PlatinumTel will re-certify the eligibility of its Lifeline subscriber base as of June 1, 2012 by the end of 2012 and report the results to USAC by January 31, 2013.²¹ Where ongoing eligibility cannot be determined through access to a qualifying database either by the Company or the state, and there is no state administrator verifying the continued eligibility of Lifeline subscribers, the Company will re-certify the continued eligibility of all of its subscribers by contacting them, either in person, in writing, by phone (e.g., via IVR (Interactive Voice Response) System), by text message, by email, or otherwise through the Internet—to confirm their continued eligibility.²² In states where a state agency or a third party has implemented a database that carriers may query to re-certify the consumer's continued

¹⁸ *Lifeline and Link Up Reform and Modernization Order* at ¶120.

¹⁹ *Id.* at ¶122.

²⁰ PlatinumTel's Annual Verification Form is a new Exhibit A. The former Exhibit A, attached to PlatinumTel's November 8, 2011 Compliance Plan, consisted of a copy of a PSAP Certification Request Letter that is no longer applicable. See *Lifeline and Link Up Reform and Modernization Order* at ¶375.

²¹ *Lifeline and Link Up Reform and Modernization Order* at Appendix C.

²² *See Id.*

eligibility, the Company (or state agency or third-party, where applicable) will instead query the database and maintain a record of what specific data was used to re-certify eligibility and the date of re-certification.²³ The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact PlatinumTel. PlatinumTel will provide written notice of impending service termination to subscribers who do not respond to the annual re-certification within 30 days. Anyone who does not respond to the impending termination letter within 30 days to demonstrate that his or her Lifeline service should not be terminated will be de-enrolled from the Company's Lifeline program.²⁴

4. Sample Marketing Materials

PlatinumTel will market its Lifeline plans, containing its own ETC name²⁵, Care Wireless, through various media, including through personal contact, print and television advertisements. PlatinumTel will incorporate into its Lifeline marketing materials in clear, easily understood language that: (i) the service is supported by Lifeline, a government program; (ii) only eligible consumers may enroll in the program; (iii) specific documentation is necessary for enrollment; and (iv) the benefit is limited to one per household and is no-transferrable.²⁶ At page 11 of the PlatinumTel Compliance Plan, PlatinumTel described how its marketing materials reinforce the Commission's rules with respect to the prevention of waste, fraud and abuse. Revised Exhibit B, attached hereto, is a marketing script to be used during telephonic customer contacts.²⁷ Exhibit C to the PlatinumTel Compliance Plan contains a sample of PlatinumTel's marketing material.

²³ Id. at ¶131.

²⁴ Id. at ¶¶141-43.

²⁵ Id. at ¶275; 47 C.F.R. §54.405(d).

²⁶ Id. at ¶275; 47 C.F.R. §54.405(c).

²⁷ The Revised Exhibit B is intended to replace the original Exhibit B that was attached to PlatinumTel's November 8, 2011 Compliance Plan.

Attached to this letter as Exhibit C-1 is an additional PlatinumTel sample marketing flyer. Finally, a copy of PlatinumTel's Lifeline Application Form is attached to this letter as Exhibit D.

5. Description of how PlatinumTel will Offer Service

In Illinois, PlatinumTel operates, manages and markets all aspects of the customer experience, including in-house U.S. based customer service, 411 directory assistance, international calling, IT services, pricing, the PlatinumTel website, handset procurement, handset logistics, handset selection, service offerings, entertainment applications and marketing materials. PlatinumTel began offering Lifeline services in Illinois in March 2011. The company's Lifeline package includes not only a free phone, but more minutes and cheaper text messaging rates than other prepaid wireless Lifeline providers. In fact, for the last two years PlatinumTel has offered the lowest cost prepaid wireless services to consumers in the United States.

6. Geographic Area of PlatinumTel's Service

PlatinumTel is currently certified as both a facilities based wireline and wireless ETC in Illinois for the non-rural areas of the Illinois Bell Telephone Company ("AT&T Illinois") territories.

PlatinumTel has a pending Petition before this Commission for Eligible Telecommunications Carrier Designation for Low Income Support only for the non-rural areas of Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia.²⁸

²⁸ *In the Matter of Telecommunications Carriers Eligible to Receive Universal Service Support, PlatinumTel Communications, LLC Petition for Designation as an Eligible Telecommunications Carrier for Low Income Support Only*, WC Docket No. 09-197 (Submitted August 5, 2011).

PlatinumTel expects to seek additional state Public Utility Commission ETC designations within the coming year.

7. Description of Lifeline Service Plan Offerings

At page 13 of the PlatinumTel Compliance Plan, PlatinumTel described the three plans that it will offer to its Lifeline-only subscribers. As described more fully therein, PlatinumTel will offer the following three plans:

250 Free Minutes: This plan includes 250 free minutes added on the first day of the month. Unused minutes expire on the first day of the month when the account is replenished with the next month's 250 free minutes. If a subscriber runs out of minutes, they have the option to purchase additional airtime billed at \$.05 per minute and \$.02 per text message

150 Free Voice Minutes and 50 Free Text Messages: This plan includes 150 free voice minutes and 50 free text messages added on the first day of the month. Unused minutes and text messages carry over to the next month. If a subscriber runs out of minutes, they have the option to purchase additional airtime billed at \$.05 per minute and \$.02 per text message.

500 Talk and Text Credit: Subscribers can purchase the 500 voice minutes and 500 text message monthly bundle for \$10. This plan normally costs \$20.

C. PlatinumTel has the Financial and Technical Ability to Provide Lifeline Supported Services.

Paragraph 388 of the *Lifeline and Link Up Reform and Modernization Order* updated the Commission's rules to ensure that Lifeline-only ETCs have the financial and technical ability to offer Lifeline-supported services. PlatinumTel's officers have extensive experience in the telecommunications industry. PlatinumTel's services include voice calling, text messaging, internet access, and broadband. PlatinumTel is certified to provide wireline and wireless telecommunications services in Illinois. The Company has been providing prepaid wireless

services in Illinois since 2001. Additionally, PlatinumTel began providing wireless lifeline services in Illinois in March 2011. PlatinumTel has a strong IT team devoted to the development of unique business services and over the years has maintained a robust and profitable telecommunications operations. The success of PlatinumTel's business is due in large part to the continuity of its highly qualified management team with over 50 years of combined relevant experience. PlatinumTel is one of the oldest and largest prepaid wireless companies in the United States. The company is based in Justice, Illinois and has provided prepaid wireless services since 2001.

The company serves primarily residential consumers, most of who reside in urban and inner-city areas. Many of these consumers do not have bank accounts and have limited available funds to purchase communications services. In Illinois, PlatinumTel uses a combination of its own network facilities as well as reselling the services of Sprint PCS.

D. PlatinumTel will Comply with the Commission's Reporting Requirements.

PlatinumTel agrees to annually report the names and identifiers used by PlatinumTel, its holding company, operating companies and affiliates.²⁹ Additionally, PlatinumTel agrees to provide to the Commission and USAC general information regarding the terms and conditions of the Lifeline Plans for voice telephony service offered specifically for low income consumers through the program they offered during the previous year, including the number of minutes provided, and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.³⁰

²⁹ See *Lifeline and Link Up Reform and Modernization Order* at ¶390.

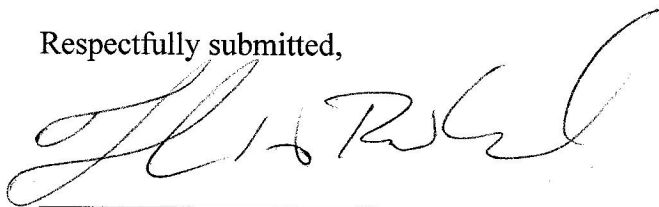
³⁰ Id.

E. PlatinumTel will Comply with the Commission's Recordkeeping Requirements.

PlatinumTel agrees to comply with the recordkeeping requirements outlined in the *Lifeline and Link Up Reform and Modernization Order*. Section 54.417 of the new rules requires all ETCs to “maintain records to document compliance with all Commission and state requirements governing the Lifeline and Linkup program for the three full preceding calendar years and to provide that documentation to the Commission or Administrator upon request.”³¹ Section 54.417 of the new rules also require all ETCs to “maintain the documentation required in §§54.410(d) (initial eligibility certification) and 54.410(f) (eligibility recertification) for as long as the subscriber receives Lifeline service from that ETC.”³² PlatinumTel will therefore maintain records pursuant to §§54.410(d) and 54.410(f) on all individual Lifeline accounts that will be stored for as long as the account is active and for a minimum of three years after the account has been terminated.

April 23, 2012

Respectfully submitted,



Thomas H. Rowland
Kevin D. Rhoda
Rowland & Moore LLP
200 West Superior Street
Suite 400
Chicago, Illinois 60654

Counsel to PlatinumTel Communications, LLC

³¹ 47 CFR 54.417(a).

³² Id.

PlatinumTel List of Exhibits

| | |
|---------------------|---|
| Exhibit A | Care Wireless Annual Verification Form ¹ |
| Exhibit B (revised) | Care Wireless Enrollment Script ² |
| Exhibit C-1 | Care Wireless Brochure |
| Exhibit D | Care Wireless Lifeline Application Form |

¹ Exhibit A is intended to replace Exhibit A from PlatinumTel's November 8, 2011 Compliance Plan

² Revised Exhibit B is intended to replace Exhibit B from PlatinumTel's November 8, 2011 Compliance Plan.

Exhibit A

Care Wireless Annual Verification Form



P.O. BOX 1109
BRIDGEVIEW, IL 60455
Office (855)711- 2222
Fax (855)722- 2022

ANNUAL VERIFICATION FORM

FINAL NOTICE

YOUR LIFELINE SERVICE WILL BE TERMINATED IN 30 DAYS IF YOU DO NOT COMPLETE THE ANNUAL VERIFICATION.

In order to maintain Government Supported Lifeline Service you must annually verify your eligibility to receive Lifeline benefits. Failure to annually verify your eligibility will result in de-enrollment from the program.

There are three (3) ways to verify your eligibility:

Online: www.carewireless.com/verify

Phone: 855-711-2222

Mail: Complete this form and mail it to:
Care Wireless
PO BOX 1109
Bridgeview, IL 60455

First Name: _____ Last Name: _____

Date of Birth: _____ Last four SSN: _____ Zip Code: _____

Please read the information below and **initial each box** to acknowledge that you understand the terms of maintaining Care Wireless Lifeline service. Please note, that if you do not verify your service every year, you will be de-enrolled from the Lifeline program. If you wish to de-enroll, but still keep your service with Care Wireless, you can purchase airtime at thousands of locations nationwide.

By initialing the boxes below and submitting this form, you are certifying under penalty of perjury that the information you have provided is true and correct, and that you agree to the terms contained in this form. You also agree and understand that providing false information is punishable by law.

☐

I certify under penalty of perjury that I am the Head of Household entitled to receive Lifeline supported service and that I personally qualify to receive Lifeline supported service, and that if I no longer qualify for Lifeline supported service I will notify Care Wireless immediately.

☐

I certify under penalty of perjury and understand that only one Lifeline supported phone line is available per household, and that I do not receive Lifeline supported service from any other provider.

Signature: _____ Date: _____

Re-Certification is good for up to one (1) year from the date of signing. This Re-Certification must be updated annually to avoid program termination.

Exhibit B (revised)

Care Wireless Enrollment Script

Care Wireless Enrollment Script:

CSR: Thank you for calling Care Wireless my name is _____ how may I assist you today?

Caller: I would like enroll in Care Wireless Lifeline service.

CSR: Wonderful, I will be able to assist you in the process. I will need to ask you some questions to get started. Is that ok?

Before you proceed, please verify customer has social security number. IF they do not, unfortunately we cannot provide lifeline service.

CSR: Are you the head of household?

If Yes, continue

If No, explain the Lifeline service is only available to the head of household

CSR: Are you 18 years old or older?

If Yes, continue

If No, explain that the service is only available to consumers who are at least 18 years old

CSR: Are you currently residing in the state of Illinois?

If Yes, continue

If No, explain that Care Wireless service is currently only available in the State of Illinois

CSR: Are you or anyone in your household currently receiving lifeline benefits for wireless or home phone service? For example, Safelink or ReachOut Wireless?

If NO, Continue

If YES, CALLER **DOES NOT** QUALIFY.

FOLLOW THIS : Sir/ma'am, Lifeline service is limited to one per household. If you would like to receive Lifeline service from Care Wireless, please contact your current Lifeline provider and cancel the service. Once you cancel that service, please contact us to set up Care Wireless service.

CSR: Are you currently participating in any government assistance programs? If so, which one?

If Yes, continue

If No, caller does not qualify. Explain that they must participate in one of the qualifying government programs in order to receive Care Wireless Lifeline service.

CSR: Participating in _____ *(say the name of the qualifying program chosen by*

the customer) may qualify you for Care Wireless Lifeline Service, which is a federal benefit. If approved, Care Wireless Lifeline service will provide you with a free wireless phone with \$12.50 worth of monthly airtime.

-----FILL OUT APPLICATION NOW-----

CSR: There are a few more questions that I will need to ask. Please respond with Yes or No to the following questions.

CSR: DO YOU CERTIFY UNDER PENALTY OF PERJURY THAT THE INFORMATION CONTAINED WITHIN THIS APPLICATION IS TRUE AND CORRECT AND THAT YOU ARE THE HEAD OF HOUSEHOLD AND THE ONLY PERSON IN YOUR HOUSEHOLD CURRENTLY RECEIVING LIFELINE ASSISTANCE AND THAT VIOLATING THE ONE PER HOUSEHOLD POLICY VIOLATES PROGRAM RULES AND WILL RESULT IN DIS-ENROLLMENT FROM THE PROGRAM. YOU ALSO UNDERSTAND THAT COMPLETION OF THIS APPLICATION DOES NOT CONSTITUTE IMMEDIATE APPROVAL FOR SERVICE AND THAT CARE WIRELESS SERVICE IS NOT TRANSFERABLE.

Customer must answer YES to continue.

CSR: DO YOU UNDERSTAND THAT YOU MAY BE REQUIRED TO VERIFY CONTINUED ELIGIBILITY FOR CARE WIRELESS SERVICE AT ANY TIME AND FAILURE TO VERIFY ELIGIBILITY WILL RESULT IN TERMINATION OF CARE WIRELESS SERVICE, AND IN THE FUTURE IF YOU ARE NO LONGER ELIGIBLE YOU WILL NOTIFY CARE WIRELESS WITHIN FIVE (5) DAYS.

Customer must answer YES to continue

CSR: DO YOU ACKNOWLEDGE THAT PROVIDING FALSE OR FRAUDULENT DOCUMENTATION IN ORDER TO RECEIVE ASSISTANCE IS PUNISHABLE BY LAW AND THE PENALTIES OF PERJURY INCLUDE MONETARY FINES AND POTENTIAL IMPRISONMENT. YOU ALSO UNDERSTAND THAT YOU MUST NOTIFY CARE WIRELESS WITHIN 30 DAYS IF YOU MOVE, AND THAT IF YOU ARE USING A TEMPORARY ADDRESS YOU WILL BE REQUIRED TO VERIFY YOUR ADDRESS EVERY 90 DAYS, FAILURE TO DO SO WILL RESULT IN DE-ENROLLMENT FROM THE PROGRAM.

Customer must answer YES to continue

CSR: Thank you. We have now completed your Care Wireless Lifeline enrollment. You will receive your phone within 2 weeks, upon approval. PLEASE NOTE THAT YOU MUST VERIFY YOUR ELIGIBILITY EVERY YEAR WITH CARE WIRELESS, IF YOU DO NOT VERIFY, YOU WILL BE DE-ENROLLED FROM THE PROGRAM YOU'RE IN.

CSR: The phone will have \$12.50 worth of airtime which you can use for calling or texting. The rate is \$0.05 per minute and \$0.02 per text message, (it would be 250 minutes OR 625 text messages). Keep in mind your account will be replenished on the first day of every month and you must keep your phone powered on for the first three days of every month for Care Wireless Systems Check (to confirm the account is being in use). Please understand that if your service goes unused for 60 days, your service will be

suspended, subject to a 30 day period during which you may use the service or contact Care Wireless to confirm that you want to continue receiving service.

CSR: If at any point you need to add additional minutes, you can purchase minutes with PlatinumTel Wireless. To find a location you can visit their website, www.Ptel.com or our website, www.CareWireless.com.

CSR: Is there anything else I may assist you with today?

If Yes, assist customer in any way possible

If No, Thank you for calling Care Wireless, *where we care about keeping you connected.*

Exhibit C-1

Care Wireless Brochure

Stay connected with your family & friends with the Care Wireless Lifeline Program.

Care Wireless will give you:

- A FREE WIRELESS PHONE
- 250 FREE MINUTES EVERY MONTH (or 625 Text Messages)
- Free Nationwide Long Distance
- No Contract
- No Monthly Bill

Care Wireless Lifeline Service is a government supported program that provides eligible customers with a free wireless phone and free monthly airtime minutes.

Visit **www.carewireless.com** to find out if you qualify and to **enroll instantly online!**

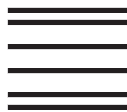
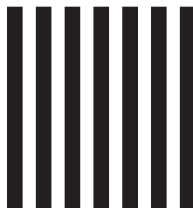
Enroll Online:
www.carewireless.com

How do you qualify?

To qualify for Care Wireless Lifeline Service you must be enrolled in one of the following programs:

- ✓ SNAP / Food Stamps / WIC
- ✓ Federal Public Housing Assistance - Section 8
- ✓ Supplemental Security Income - SSI
- ✓ Medicaid
- ✓ National School Free Lunch Program
- ✓ Temporary Assistance to Needy Families - TANF
- ✓ Low Income Home Energy Assistance Program - LIHEAP
- ✓ Bureau of Indian Affairs Programs

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 618 BRIDGEVIEW IL

POSTAGE WILL BE PAID BY ADDRESSEE

CARE WIRELESS
PO BOX 1109
BRIDGEVIEW IL 60455-9910



FREE PHONE 250 FREE MINUTES EVERY MONTH



Stay Connected...
with Family
with Friends
in an Emergency



**YOU PAY NOTHING!
NO FEES!
NO CONTRACT!
NO CREDIT CHECK!**

www.carewireless.com

WELCOME
to **CARE**
WIRELESS

Guide to Care Wireless Service

Thank you for choosing Care Wireless.
A Lifeline Product

Dear Care Wireless Customer,

Congratulations, you have qualified for Care Wireless Service, a government supported program that provides free minutes of airtime each month. And in the event of an emergency, 911 is always a free call.

For complete information on Care Wireless
visit **www.carewireless.com**

care
WIRELESS

855-711-2222

www.carewireless.com

Getting started with your Care Wireless phone

Your phone is active and ready for you to use.

Receiving your monthly minutes

Your monthly minutes are loaded onto your account automatically on the first day of every month. In order to receive your monthly minutes **you must have your phone on for the first three (3) days of every month.**

Keeping your Care Wireless service active every year

In order to keep your Care Wireless Service active, you must verify your service every year. You can do this by simply visiting carewireless.com or calling a Care Specialist at 855-711-2222.

How Care Wireless service works

Using your Care Wireless phone is simple. Every month, we will automatically credit your account with your free airtime.

If you have questions about how you can use your airtime, please visit us online at **www.carewireless.com**.

Phone warranty

Your phone comes with a 30 day warranty. If in the first 30 days your phone is not working properly, you may ship your phone back to us and we will send you a replacement. Certain restrictions apply, please contact Care Wireless for details.

Care Wireless is a service provided by PlatinumTel

www.carewireless.com

care

Need more airtime?

To add more airtime to your phone, simply purchase PlatinumTel Wireless airtime available at over 36,000 locations in the U.S. To find a location near you visit **www.carewireless.com**.

PlatinumTel Wireless airtime is also available at all MoneyGram Agent Locations. To find a MoneyGram Agent Location, please visit **moneygram.com/platinumtel**.

You can add more airtime to your Care Wireless account by setting up your online account at **www.carewireless.com**.

How to check your balance:

There are **2 easy ways** to check your airtime balance:

1. Send a text message to **9080** with the word **"BAL"**. This is a free message that will not deduct from your airtime
2. Set up an online account at **www.carewireless.com** and log in to check your minute and text usage.

How much is the airtime?

Care Wireless gives you the lowest pay-as-you-go wireless rates in the U.S. If you purchase additional minutes you will only pay **2¢ per text message** sent and received and **5¢ per voice minute**.

2¢ per
SMS
*sent or received

5¢ per
minute

Please visit us online at **www.carewireless.com**
for the latest and complete terms & conditions

www.carewireless.com

care

Exhibit D

Care Wireless Lifeline Application



FREE WIRELESS PHONE

&

FREE 250 MONTHLY AIRTIME MINUTES

This completed form is required in order to enroll you in the Lifeline Program in your state. This authorization form is solely for the purpose of verifying your participation in the programs listed below, and will not be used for any other purpose.

A Lifeline Product

IMPORTANT INFORMATION ABOUT THE LIFELINE PROGRAM

1. The Lifeline Program is a federally supported benefit
2. Lifeline Service is only available for one line per household. A household cannot receive benefits from multiple providers
3. A household is defined as (for the purposes of the Lifeline Program), any individual or group of individuals who live together at the same address and share income and expenses.

Please **PRINT** your information below (*applications with missing information will not be processed*):

First Name: _____ Mi: _____ Last Name: _____

Last 4 Digits of Social Security #: _____ Date of Birth: Month _____ Day _____ Year _____

Address: _____ Apt #/Unit #: _____

City: _____ State: _____ Zip Code: _____ Email Address: _____

This address is (check one): ☐ Permanent | ☐ Temporary | ☐ Multi-Household Contact Phone #: _____

_____ I hereby certify under penalty of perjury that I participate in at least one of the following programs (check all that apply):

- | | |
|--|--|
| _____ SNAP / Food Stamps / WIC | _____ Federal Public Housing Assistance / Section 8 |
| _____ Medicaid | _____ Supplemental Security Income / SSI |
| _____ National School Free Lunch Program | _____ Temporary Assistance to Needy Families / TANF |
| _____ Bureau of Indian Affairs | _____ Low Income Home Energy Assistance Program / LIHEAP |

_____ I certify under penalty of perjury that my household income is at or below 135% of the Federal Poverty Guidelines (FPG)
Initial Here There are _____ individuals in my household

I certify under penalty of perjury (Initial Each Certification Below):

- _____ 1) The information contained in my application remains true and correct to the best of my knowledge and I acknowledge that willfully providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in me being barred from the program.
- _____ 2) I am a current recipient of the program(s) checked above, or have an annual household income at or below 135% of the Federal Poverty Guidelines.
- _____ 3) I have provided documentation of eligibility if required to do so.
- _____ 4) I understand that I and my household can only have one Lifeline-supported telephone service. Care Wireless has explained the one-per-household requirement. I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the Lifeline program, and could result in criminal prosecution by the United States Government
- _____ 5) I attest to the best of my knowledge, that I and no one in my household is receiving a Lifeline-supported service from any other land line or wireless company such as Safelink, Assurance, or Reachout Wireless.
- _____ 6) I understand that my Care Wireless Lifeline service is non-transferable. I may not transfer my service to any individual, including another eligible low-income consumer.
- _____ 7) I understand that if my service goes unused for sixty (60) days, my service will be suspended, subject to a thirty (30) day period during which I may use the service or contact Care Wireless to confirm that I want to continue receiving service.
- _____ 8) I will notify Care Wireless within thirty (30) days if I no longer qualify for Lifeline. I understand this requirement and may be subject to penalties if I fail to notify my phone company. Specifically, I will notify Care Wireless if:
 - a) I cease to participate in the above federal or state program, or my annual household income exceeds 135% of the Federal Poverty Guidelines;
 - b) I am receiving more than one Lifeline supported service;
 - c) I no longer satisfy the criteria for receiving Lifeline support.
- _____ 9) I will notify Care Wireless within thirty (30) days of moving. Additionally, if my address listed above is a temporary address, I understand that I must verify my address with Care Wireless every ninety (90) days. If I fail to respond to Care Wireless' verification attempts within thirty (30) days, my Care Wireless Lifeline service may be terminated.
- _____ 10) Care Wireless has explained to me that I am required each year to re-certify my continued eligibility for Lifeline. If I fail to do so within thirty (30) days, it will result in termination of my Care Wireless Lifeline service.
- _____ 11) I understand, and consent to the fact that my name, telephone number, and address will be provided to the Universal Service Administrative Company, the administrator of the Lifeline program, and/or its agents, for the purpose of verifying that I do not receive more than one Lifeline benefit.

Applicant Signature

Date

Only one phone per household address allowed regardless of how many government assisted recipients reside at the address. All enrollment forms must have all sections completed, this includes: last 4 numbers of the social security number, date of birth, and it must be signed and dated. Incomplete forms will not be processed. There are absolutely no exceptions. Please allow 3-4 weeks for processing and shipping. We can only ship to a residential address and NOT a PO Box. Care Wireless: PO Box 1109, Bridgeview, IL 60455. Certain restrictions apply. Phone models vary by availability. Service varies by coverage area.